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**DoddDelCollo.com**

March 13, 2025

**Via E-FILE**

District Judge Gregory H. Woods  
USDC  
Southern District of New York

USDC SDNY  
DOCUMENT  
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**MEMORANDUM ENDORSED**

**Re: *Juan Dominguez v. North Dallas Moving & Storage Co, Inc., et al.;***  
Docket No. 1:24-cv-07119-GHW  
Dodd DelCollo File No.: 1384-6996

Dear Hon. Woods:

Please accept this Joint Letter on behalf of the parties in the above matter. This office represents defendants Deandre Thompson and North Dallas Moving & Storage Co, Inc.

The parties have met and conferred and respectfully request a 60-day extension of fact discovery through May 14, 2025. The reason for the discovery extension is that the Defendants are awaiting medical records in response to Plaintiff's executed medical authorizations and depositions must be completed once the records are received. Defendants are working diligently to secure these medical records.

Thank you for your courtesies and attention to this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Kalliopi Kousis'.

Kalliopi P. Kousis

cc:

David L. Henderson, Esq. (Via Email [dave@spektorlaw.com](mailto:dave@spektorlaw.com) )  
Spektor & Associates, P.C.

The Court will hold a teleconference on March 18, 2025 at 4:00 p.m. to discuss the parties' application for an extension of the discovery deadlines outlined in the case management plan, entered on November 14, 2024. Dkt. No. 13. The parties are directed to the Court's Individual Rules of Practice in Civil Cases, which are available on the Court's website. Rule 2 of the Court's Individual Rules contains the dial-in number for the conference and other relevant instructions. The parties are specifically directed to comply with Rule 2 (C) of the Court's Individual Rules. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 13.

SO ORDERED.

Dated: March 13, 2025  
New York, New York

  
GREGORY H. WOODS  
United States District Judge